

REMARKS

I. General

Claims 1-54 are pending in the application, and all are rejected by the Office Action mailed July 29, 2005. Claim 1 is amended by this response. The issues in the current Office Action are:

- Claims 1-26 are rejected under 35 U.S.C. §112, second paragraph.
- Claims 1, 9, 10, and 27-30 are rejected under 35 U.S.C. §103(a) over US 6,674,756 (hereinafter, *Rao*) in view of US 5,278,985 (hereinafter, *Jourdenais*).
- Claims 2, 15, 31, 42 are rejected under 35 U.S.C. §103(a) over *Rao* in view of *Jourdenais* in further view of the present application specification.
- Claims 4-7, 11-14, 16-19, 21-26, 33-41, 43-47, and 49-54 are rejected under 35 U.S.C. §103(a) over *Rao*.
- Claims 20 and 48 are rejected under 35 U.S.C. §103(a) over *Rao* in view of *Jourdenais* in further view of US 6,282,678 (hereinafter, *Snay*).
- Claims 3, 8, and 32 are rejected under 35 U.S.C. §103(a) over *Rao* in view of *Jourdenais* in further view of US Pub. 2002/0035641 (hereinafter, *Kurose*).

Applicant hereby traverses the rejections and requests reconsideration and withdrawal in light of the remarks contained herein.

II. Amendments to the Claims

Claim 1 is amended to change “virtualized variables” to “global variables.” Such amendment does not narrow the scope of claim 1, nor is it in response to any art.

III. Rejections Under 35 U.S.C. §112

On page 2 of the Office Action, claims 1-26 are rejected under 35 U.S.C. §112, second paragraph, for indefiniteness. Specifically, claims 1-26 are rejected for use of the terms, “global variables,” and “virtualized variables” in claim 1. Applicant has amended claim 1 to change “virtualized variables” to “global variables.” Applicant believes that amended claim 1 is definite and that dependent claims 2-26 are also definite. Accordingly, the withdrawal of the 35 U.S.C. §112 rejection is respectfully requested.

IV. Rejections Under 35 U.S.C. §103

A. Rejections over Rao in view of Jourdenais

On pages 3-4 of the Office Action, claims 1, 9, 10, and 27-30 are rejected under 35 U.S.C. §103(a) over *Rao* in view of *Jourdenais*. Applicant traverses the rejection.

To establish a prima facie case of obviousness under 35 U.S.C. § 103(a), three basic criteria must be met. First, there must be some suggestion or motivation, either in the reference itself or in the knowledge generally available to one of ordinary skill in the art, to modify the applied reference. Second, there must be a reasonable expectation of success. Finally, the applied reference must teach or suggest all the claim limitations. *See* M.P.E.P. § 2143. Without conceding any other criteria, Applicant respectfully asserts that the rejection does not satisfy the third criterion, as discussed further below.

Independent claim 1 recites, in part, “each said process running in a said virtual router domain independently of all other said virtual router domains.” The Office Action does not rely on *Jourdenais* to teach or suggest this feature, nor does *Jourdenais* teach or suggest this feature. Additionally, *Rao* does not teach or suggest this feature. The Office Action cites the passage at column 19, lines 32-33 as teaching the feature; however, such assertion is incorrect. The cited passage states, “Thus, each VR functions as a separate router in an independent and self-contained manner.” The cited passage does not address the arrangement of processes, let alone, whether processes in each virtual router domain are independent of all other virtual router domains. Further, that each *Rao* VR functions as a separate router does not necessarily lead to the conclusion that processes in each virtual

router domain are independent of all other router domains, since it is possible that the VRs can share processes. In fact, it appears that *Rao* does not describe the apparatus at a sufficient level of detail to teach or suggest the above-recited feature. Accordingly, the cited combination does not teach or suggest, “each said process running in a said virtual router domain independently of all other said virtual router domains,” as recited in part by claim 1.

Independent claim 27 recites, in part, “said processes run in said virtual router domains independently of one another.” As explained above, neither *Jourdenais* nor *Rao* teaches or suggest the above-recited feature. First, the Office Action does not use *Jourdenais* to teach or suggest the feature, nor does it teach or suggest the feature. Second, *Rao* does not teach or suggest the recited feature because even if each *Rao* VR functions as a separate router, such operation does not necessarily lead to the conclusion that processes in each virtual router domain are independent of all other router domains, since it is possible that the VRs can share processes. In fact, it appears that *Rao* does not describe the apparatus at a sufficient level of detail to teach or suggest the above-recited feature. Accordingly, the cited combination does not teach or suggest, “said processes run in said virtual router domains independently of one another,” as recited in part by claim 27.

Dependent claims 9, 10, and 28-30 each depend either directly or indirectly from respective independent claims 1 and 27 and, thus, inherit all of the limitations of their respective independent claims. Thus, the cited combination does not teach or suggest all claim limitations of claims 9, 10, and 28-30. It is respectfully submitted that dependent claims 9, 10, and 28-30 are allowable at least because of their dependence from their respective base claims for the reasons discussed above. Furthermore, the dependent claims are allowable in their own right, as they recite features that are not taught or suggested by the cited combination.

For instance, dependent claim 9 recites, in part, “said macros generate an array of said global variables when said virtual router domain is configured in.” Dependent claim 29 recites, in part, “said macros generate arrays of global variables when said virtual router domain is configured in within said host router.” *Jourdenais* does not teach or suggest the above-recited features because *Jourdenais* does not describe how and when an array of global variables is generated, much less that an array of global variables is generated by a macro

when a virtual router domain is configured in. *Rao* does not teach or suggest the above-recited features because it, also, does not teach how and when an array of global variables are generated. Accordingly, the cited combination does not teach or suggest the above-recited features of claims 9 and 29.

Still further, dependent claim 10 recites, in part, "said macros generate scalar global variables when said virtual router domain is deconfigured." Dependent claim 30 recites, in part, "said macros generate scalar global variables when said virtual router domain is deconfigured." *Jourdenais* does not teach or suggest the above-recited features because *Jourdenais* does not describe how and when scalar global variables are generated, much less that scalar global variables are generated by a macro when a virtual router domain is deconfigured. *Rao* does not teach or suggest the above-recited features because it, also, does not teach how and when scalar global variables are generated. Accordingly, the cited combination does not teach or suggest the above-recited features of claims 10 and 30. It should also be noted that claims 10 and 30 are allowable at least because they depend, respectively, from claims 9 and 29. Accordingly, it is respectfully requested that the rejections of claims 1, 9, 10, and 27-30 be withdrawn

B. Rejections over Rao in view of Jourdenais in further view of AAPA

On pages 4-5 and 6-7, the Office Action rejects claims 2, 15, 31, and 42 under 35 U.S.C. §103(a) over *Rao* in view of *Jourdenais* in further view of the present application specification. Dependent claims 2, 15, 31, and 42 each depend either directly or indirectly from respective independent claims 1 and 27 and, thus, inherit all of the limitations of their respective independent claims. As shown above, the combination of *Rao* and *Jourdenais* does not teach or suggest each and every feature of independent claims 1 and 27. The Office Action does not rely on AAPA to teach or suggest the missing features. Thus, the cited combination does not teach or suggest all claim limitations of claims 2, 15, 31, and 42. It is respectfully submitted that dependent claims 2, 15, 31, and 42 are allowable at least because of their dependence from their respective base claims for the reasons discussed above. Accordingly, it is respectfully requested that the rejections of claims 2, 15, 31, and 42 be withdrawn.

C. Rejections over Rao

On pages 5-6 and 7-9, the Office Action rejects claims 4-7, 11-14, 16-19, 21-26, 33-41, 43-47, and 49-54 under 35 U.S.C. §103(a) over *Rao*. Applicant traverses the rejections.

First, claims 4-7, 11-14, 16-19, 21-26, 33-41, 43-47, and 49-54 depend from respective independent claims 1 and 27, and, thus, inherit all of the limitations of those respective independent claims. In rejecting claims 1 and 27, the Office Action admits that *Rao* does not teach or suggest some features of those independent claims. *See* Office Action at 3-4. Since those features are inherited by dependent claims 4-7, 11-14, 16-19, 21-26, 33-41, 43-47, and 49-54, the present 35 U.S.C. §103 rejection over *Rao*, by itself, is defeated by noting that even the Office Admits that not all features are taught or suggested by *Rao*. Further, as shown above, other features of the independent claims are not taught or suggested by *Rao*. Accordingly, it is respectfully requested that the rejections of dependent claims 4-7, 11-14, 16-19, 21-26, 33-41, 43-47, and 49-54 be withdrawn.

Second, the claims are allowable in their own right, as they include limitations that are not taught or suggested by *Rao*. For instance, claims 6 and 34 include independently running plural identical copies of at least one said process. Such feature is not taught or suggested by *Rao*. The Office Action cites the passage at column 19, lines 34-38 and 53-61 as teaching the feature; however, such assertion is incorrect. The cited passages discuss providing system resources. However, there is no mention of independently running plural identical copies of processes. Thus, *Rao* does not teach or suggest the above-recited feature of claims 6 and 34.

Dependent claims 12 and 39 recite, in part, “during said reconfiguring network traffic is removed from said interfaces that are repartitioned.” *Rao* does not teach or suggest these features. The Office Action cites the passage at column 19, lines 53-61, as teaching the features; however, such assertion is incorrect. The cited portion teaches allocating resources to virtual routers, but does not teach or suggest removing network traffic from interfaces during reconfiguring. In fact, the cited passage makes no mention of removing network traffic from interfaces. Thus, *Rao* does not teach or suggest the above-recited features of claims 12 and 39.

Dependent claim 16 recites, in part, “a socket created by at least one said process, said socket being associated exclusively with the virtual router domain in which it is created and containing said unique domain ID address of said domain in which it is created.” Claim 17 recites, in part, “multiple sockets are created by said at least one process in at least one said virtual router domain, such that each of said multiple sockets is associated exclusively with the virtual router domain in which said socket is created.” Claim 43 recites, in part, “said process creates a socket, such that said socket is associated permanently and exclusively with the virtual router domain in which it is created and containing said unique domain index number of said domain in which it is created.” Finally, claim 44 recites, in part, “multiple sockets are created by at least one said process in at least one said virtual router domain, such that each of said multiple sockets is associated permanently and exclusively with the virtual router domain in which said socket is created.” *Rao* does not teach or suggest these features because *Rao* does not teach or suggest the claimed exclusive associations. The Office Action cites the passage at column 19, line 67, through column 20, line 3, which teaches the actions of a resource manager when a call is received. However, the described actions do not teach, suggest, or require the claimed exclusive associations. The passage at column 20, lines 11-15 also does not show an operation that teaches or suggests the claimed exclusive association. Thus, *Rao* does not teach or suggest the above-recited features of claims 16, 17, 43, and 44.

Dependent claim 18 recites, in part, “said at least one process is movable from one said virtual router domain to a different said virtual router domain, such that said at least one process creates a said socket in each of at least two said virtual router domains.” Claim 45 recites, in part, “moving said at least one process from one said virtual router domain to a different said virtual router domain, such that said at least one process creates a said socket in each of at least two said virtual router domains.” *Rao* does not teach or suggest this feature because it does not teach or suggest a moveable process that creates sockets in at least two virtual router domains, and, in fact, does not teach or suggest properties or operations of sockets at all.

Dependent claims 19 and 47 recite, in part, “a particular socket associated with a particular virtual router domain is applied exclusively to live traffic networking independently of any other said virtual router domain of said host router.” *Rao* does not

teach or suggest this feature because it does not teach such exclusive application of a particular socket independent of other virtual router domains, and, in fact, does not teach or suggest properties or operations of sockets at all.

Dependent claims 24 and 52 recite, in part, “one particular virtual router domain within said host router contains routing tables exclusively for internal interface addresses within said host router independently of any other said virtual router domain of said host router.” *Rao* does not teach or suggest this feature because it does not teach such routing tables exclusively for internal interface addresses within the host router and independent of other virtual router domains.

Dependent claims 25 and 53 recite, in part, “a particular virtual router domain within said host router contains routing tables exclusively for interfaces externally visible from outside said host router independently of any other said virtual router domain of said host router.” *Rao* does not teach or suggest this feature because it does not teach or suggest such routing tables exclusively for externally visible interfaces and independent of other virtual router domains.

D. Rejections over *Rao* in view of *Jourdenais* in further view of *Snay*

On pages 9-10, the Office Action rejects claims 20 and 48 under 35 U.S.C. §103(a) over *Rao* in view of *Jourdenais* in further view of *Snay*. Applicant traverses the rejection.

As shown above, the combination of *Rao* and *Jourdenais* does not teach or suggest each and every feature of independent claims 1 and 27. The Office Action does not rely on *Snay* to teach or suggest the missing features. Thus, the cited combination does not teach or suggest all claim limitations of claims 20 and 48, which depend from respective independent claims 1 and 27. It is respectfully submitted that dependent claims 20 and 48 are allowable at least because of their dependence from their respective base claims for the reasons discussed above. Accordingly, it is respectfully requested that the rejections of claims 20 and 48 be withdrawn.

E. Rejections over Rao in view of Jourdenais in further view of Kurose

On page 10, the Office Action rejects claims 3, 8, and 32 under 35 U.S.C. §103(a) over *Rao* in view of *Jourdenais* in further view of *Kurose*. Applicant traverses the rejection.

As shown above, the combination of *Rao* and *Jourdenais* does not teach or suggest each and every feature of independent claims 1 and 27. The Office Action does not rely on *Kurose* to teach or suggest the missing features. Thus, the cited combination does not teach or suggest all claim limitations of claims 3, 8, and 32, which depend from respective independent claims 1 and 27. It is respectfully submitted that dependent claims 3, 8, and 32 are allowable at least because of their dependence from their respective base claims for the reasons discussed above. Accordingly, it is respectfully requested that the rejections of claims 3, 8, and 32 be withdrawn.

V. Conclusion

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 06-2380, under Order No. 59182/P009US/10020646 from which the undersigned is authorized to draw.

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Respectfully submitted,

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